

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc. and WorldCom, Inc.

DATE: July 26, 2001

VZ-ATT/WC 1-34: Referring to pages 36 and 37 of the Donovan testimony, provide the original source documentation and all documents concerning, referencing, relating to or substantiating the sample survey concerning the length of typical horizontal cables. Describe the methodology used to select the locations used in the sample and the determination of the length of the horizontal cables.

Respondent: J. Donovan

RESPONSE: AT&T's average horizontal drop length is the result of a survey conducted by Outside Plant Area Supervisors for AT&T Broadband in Massachusetts, New Hampshire and Maine. AT&T Broadband is the AT&T affiliate most likely to utilize horizontal inside wiring. Each of AT&T Broadband's four Area Supervisors were instructed to select a sample of Multiple Dwelling Units (MDUs) within their service territory. Supervisors were encouraged to select a cross section of buildings, representing a range of the types and sizes of MDUs within their territory. For each building surveyed, the length of the horizontal wiring was measured on each floor from the distribution point (typically the terminal block) to each individual unit. Each horizontal measurement was then added together and divided by the total number of units in each building, to come up with an average horizontal "drop" number for each building.

The attached spreadsheet includes the address of each building surveyed, along with the number of units and the average drop length. The average MDU drop length for buildings in Massachusetts is 87 feet. The average drop length used in AT&T's calculation in the Donovan testimony is 91 feet, and includes MDUs from Massachusetts, New Hampshire and Maine.

The attachment contains proprietary information and is being provided in unredacted version to the Department only. All other parties will receive redacted versions.

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VZ-ATT/WC 1-82: Referring to page 38 of the Turner testimony:

- (a) Did Mr. Turner participate in any manner in the “settled rates” in Nevada?
- (b) Identify the number of central offices Verizon has in Nevada.
- (c) Provide a copy of the Settlement Agreement.

Respondent: S. Turner

RESPONSE:

- (a) Yes.
- (b) AT&T and WorldCom object to this request on the ground that this information is more readily available to Verizon than it is to AT&T.
- (c) See (b). Subject to and without waiving this objection, AT&T and WorldCom provide a copy of the Settlement Agreement and the Order approving the Settlement Agreement as an attachment hereto.

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VZ-ATT/WC 1-114: Referring to the Turner testimony, Attachment SET 3, provide all cost documentation and workpapers, including invoices for material, that supports the AT&T/WorldCom cost calculations shown in Turner Attachment SET 3. In particular, provide all invoices to support the Power Consumption and Power Distribution rate element costs.

Respondent: S. Turner

RESPONSE: To the extent that this request information regarding AT&T and WorldCom's own operational experiences, AT&T and WorldCom object on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. This case involves Verizon-MA's forward-looking economic costs to provide UNEs. AT&T and WorldCom's own operational experience to date is not relevant to that issue.

Subject to and without waiving this objection, AT&T and WorldCom have provided the requested information in the form of an attachment hereto. Due to its voluminous nature, this attachment is being provided in electronic format only.